

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Jamaryon Till Gibson

Case: 2:23-mj-30247

Case No. Assigned To : Unassigned

Assign. Date : 6/12/2023

USA V. GIBSON (CMP)(CMC)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 8, 2023 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 922(g)(1)

Felon in Possession of a Firearm

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: June 12, 2023City and state: Detroit, MI*Complainant's signature*

Brendt Smith, Special Agent, ATF

Printed name and title*Judge's signature*

Hon. Kimberly G. Altman, United States Magistrate Judge

Printed name and title

AFFIDAVIT

I, Brendt Smith being duly sworn, depose and state the following:

I. INTRODUCTION

1. I am a Special Agent (SA) with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF). I have been employed with the ATF since January 2022. I am currently assigned to the Detroit, Michigan Field Division, Group II. In this role, I investigate violations of firearms, arson, fraud, explosives, and narcotics laws. Prior to my employment with ATF, I was employed by United States Customs and Border Protection (CBP), Office of Field Operations, for approximately eight years as a federal officer. Prior to my employment with CBP, I was a police officer for the City of Saint Clair for approximately seven years.

2. I have an associate degree in Criminal Justice from Saint Clair County Community College. I graduated from the Kirtland Regional Police Academy and completed the CBP Field Operations Academy, Criminal Investigator Training Program, and Special Agent Basic Training at the Federal Law Enforcement Training Center.

3. I make this affidavit from my personal knowledge based on my participation in this investigation, including interviews conducted by myself or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, review of reports by myself and/or

other law enforcement agents, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does include all the information known to law enforcement related to this investigation.

4. ATF is currently conducting a criminal investigation concerning Jamaryon Till GIBSON (DOB: XX/XX/2003) for violating 18 U.S.C. § 922(g)(1) as a felon in possession of a firearm.

II. PROBABLE CAUSE

5. I reviewed records related to GIBSON's criminal history and learned the following:

- a. On September 9, 2020, GIBSON was charged with misdemeanor Firearms - Discharge with Injury or Death, which is punishable by up to two years of incarceration. The pre-sentence investigation GIBSON was sentenced to a term of probation with the possibility of diversion pursuant to Michigan's Holmes Youthful Trainee Act (HYTA). GIBSON violated the terms of his probation and was sentenced to 227 days of incarceration;
- b. On June 15, 2021, GIBSON was charged with Carrying a Concealed Weapon and other misdemeanor charges. GIBSON

entered a plea of guilty to felony Carrying a Concealed Weapon. GIBSON was initially sentenced to a term of probation with the opportunity for HYTA. GIBSON violated the terms his probation. On March 1, 2023, GIBSON's HYTA status was revoked. GIBSON was sentenced to 365 days of incarceration;

- c. June 8, 2022, GIBSON was arrested by the Detroit Police Department (DPD) and charged with Carjacking, Armed Robbery, Receiving and Concealing a Motor Vehicle, Felony Accessory After the Fact, and several counts of Felony Firearm. GIBSON entered a plea to the charge of felony Accessory After the Fact. The remaining charges were dismissed. On October 27, 2022, GIBSON was sentenced to two years' probation with HYTA status.
- d. Based on my training and experience, Defendants are warned of the maximum penalty when they enter a plea of guilty to a felony.

6. On June 8, 2023, DPD officers were on patrol in the City of Detroit. DPD observed GIBSON with a large object sticking out of the top of the waistband of his shorts. DPD drove towards GIBSON. As DPD approached GIBSON, the

officers noticed he was holding a gun in his hands. GIBSON appeared to notice the officers approach, because he quickly walked away from DPD. DPD approached GIBSON to investigate. As DPD approached, GIBSON ran away, threw the firearm on the ground, and jumped over a fence. DPD eventually took GIBSON into custody. DPD recovered the firearm.

7. DPD identified the firearm as a Romarm, Model: Draco, 7.62X51 caliber pistol. The firearm contained a magazine with multiple live rounds of ammunition and one round of ammunition in the chamber. DPD officers confirmed that GIBSON did not have a concealed pistol license (CPL).

8. On June 9, 2023, I contacted ATF Interstate Nexus Expert, Special Agent Joshua McLean, and provided information about the Romarm Draco. SA McLean concluded that the firearm was manufactured outside the State of Michigan and is a firearm as defined in Title 18 U.S.C., Chapter 44, Section 921(a)(3).

III. CONCLUSION

9. Probable cause exists to believe that Jamaryon Till GIBSON knowingly possessed a firearm after having been convicted of a felony offense in violation of Title 18 U.S.C. Section 922(g). This violation occurring within the Eastern District of Michigan.

Respectfully submitted,



Brendt Smith, Special Agent
Bureau of Alcohol, Tobacco, Firearms and
Explosives

Sworn to before me and signed in my
presence and/or by reliable electronic means.



Honorable Kimberly G. Altman
United States Magistrate Judge

Dated: June 12, 2023